

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF IOWA**

|                            |   |                         |
|----------------------------|---|-------------------------|
| In re:                     | ) | Chapter 11              |
|                            | ) |                         |
| MERCY HOSPITAL, IOWA CITY, | ) | Case No. 23-00623 (TJC) |
| IOWA, <i>et al.</i>        | ) |                         |
|                            | ) | (Jointly Administered)  |
| <u>Debtors.</u>            | ) |                         |

**MERCY ACO LLC AND MERCY HEALTH NETWORK, INC.’S EXPEDITED  
MOTION TO SEAL EXHIBITS TO MOTION**

Mercy ACO LLC (“Mercy ACO”) and Mercy Health Network, Inc. (“Mercy Health Network”), by and through the undersigned, hereby move for entry of an order in substantially the form attached hereto as Exhibit A (the “Proposed Order”) authorizing Mercy ACO and Mercy Health Network to file redacted versions of their respective responses to the Trustee of the Mercy Hospital Liquidation Trust’s (“Trustee”) Objections to General Unsecured Nonpriority Claim #10272 (“Response #1”) (objections filed at Dkt. Nos. 1777 and 1778) and Objections to Claim #10277 (“Response #2”) and file an unredacted version of said pleadings and exhibits attached thereto under seal and in support thereof state as follows:

1. The Debtors, Mercy Health Network and Mercy ACO are parties to certain contracts which contain confidential and proprietary commercial information.

2. Mercy Health Network and Mercy ACO intend to rely on and cite to these confidential contracts as exhibits in Response #1 and Response #2. The confidential contracts are to be attached as Exhibits B and C to the respective pleadings. Additionally, the pleadings themselves reference terms of the confidential contracts.

3. “On request of a party in interest, the bankruptcy court shall ... protect an entity with respect to a trade secret or confidential research, development, or commercial information.” 11 U.S.C. § 107(b)(1) (West). Similarly, the Bankruptcy Rules provide the Court

may, “protect ... any entity regarding a trade secret or other confidential research, development, or commercial information.” Fed. Bank. R. 9018(a)(1).

4. To protect the information in these confidential contracts, Mercy Health Network and Mercy ACO respectfully request the Court grant this motion and authorize them to file redacted versions of the claim objection responses and file Exhibits B and C to those respective pleadings—as well as unredacted versions of the pleadings—under seal.

5. A proposed order is attached hereto.

WHEREFORE, Mercy ACO and Mercy Health Network respectfully request this Court enter the Proposed Order in substantially the form attached hereto as Exhibit A, granting the relief requested herein and such other and further relief as may be just and proper in the circumstances.

Dated: May 9, 2025

BELIN McCORMICK, P.C.

/s/ Christopher J. Jessen

Michael R. Reck

Christopher J. Jessen

666 Walnut Street, Suite 2000

Des Moines, Iowa 50309

Tel: (515) 243-7100

Fax: (515) 558-0645

mrreck@belinmccormick.com

cjessen@belinmccormick.com

*Attorneys for Mercy Health Network, Inc.*

*d/b/a MercyOne, Catholic Health*

*Initiatives-Iowa Corp., Mercy ACO, LLC,*

*Mercy Clinics, Inc., Mercy College of*

*Health Sciences, and MH NACO, LLC*

### **CERTIFICATE OF SERVICE**

The undersigned certifies, under penalty of perjury, that on May 9, 2025, the foregoing document was electronically filed with the Clerk of Court using the Northern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to the parties of the Chapter 11 cases.

/s/ Christopher J. Jessen